

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARSHAL RAVAL,

Plaintiff

v.

**CAFÉ ISTANBUL INC., NEW CAFÉ
ISTANBUL INC., CAFÉ ISTANBUL
LEGACY INC., and EROL GIRGIN,**

Defendants.

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Civil Action No. 3:18-cv-00315-M

**REPLY IN SUPPORT OF DEFENDANTS' MOTION FOR MODIFICATION OF
SCHEDULING ORDER**

Defendants Café Istanbul Inc., New Café Istanbul Inc., Café Istanbul Legacy Inc., and Erol Girgin file this Reply in Support of its Motion for Modification of Scheduling Order only to respond to two specific issues addressed in Plaintiff's Response:

1. Plaintiff asks the Court to order the parties to confer on and file a second Joint Report regarding the parties' settlement discussions in this matter by April 11, 2019. Defendants have no objection to submitting a second Joint Report by that date, if the Court believes one is necessary. The discussions between counsel leading up to the filing of Defendants' Motion for Modification of Scheduling Order centered around Plaintiff's request for a second Joint Report to be filed in mid-March before Defendants would have gained additional information regarding the merits and substance of Plaintiff's claims by way of written or oral discovery. However, now that Defendants have served written discovery, responses to which are due on March 25, 2019, a second Joint Report by April 11, 2019, is much more reasonable.

2. While Defendants have no objection to mediation conceptually, Defendants do object to incurring the expense of mediation considering their limited financial means (and desire to conserve resources) and the unlikelihood of this case settling, considering Plaintiff's current monetary demand. However, per Plaintiff's suggestion, Defendants would welcome a Court-ordered, half-day mediation with a U.S. Magistrate Judge.

Respectfully submitted,

/s/ Collin K. Brodrick

Collin K. Brodrick

Texas Bar No. 24087212

collin.brodrick@ogletree.com

**OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.**

Preston Commons

8117 Preston Road, Suite 500

Dallas, Texas 75225

Telephone: 214-987-3800

Facsimile: 214-987-3926

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF system on March 4, 2019, including the following counsel of record for Plaintiff:

Shana Khader

Anna Bocchini

EQUAL JUSTICE CENTER

1250 West Mockingbird Lane, Suite 455

Dallas, Texas 75247

Tel.: (469) 228-4226, ext. 302

Fax: (469) 941-0861

skhader@equaljusticecenter.org

abocchini@equaljusticecenter.org

/s/ Collin K. Brodrick

Collin K. Brodrick

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